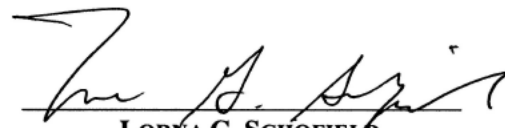


Application **DENIED**. In light of the Order, dated February 20, 2025, Plaintiff's request to seal the relevant information does not carry "the burden of showing that higher values that overcome the presumption of public access." *Under Seal v. Under Seal*, 273 F. Supp. 3d 460, 469 (S.D.N.Y. 2017).

The Clerk of Court is respectfully directed to close the motions at Dkt. Nos. 61 and 64 and lift the seal on Dkt. Nos. 52 and 62. The Clerk of Court is also respectfully directed to change the Plaintiff's name to Leopold Bennett a/k/a Arthur Vargas, and to amend the caption to Leopold Bennett v. Barclays Bank Delaware.

Dated: February 27, 2025  
New York, New York



LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Re: Vargas v. Barclays Bank Delaware  
Case No. 24-cv-06549-LGS (S.D.N.Y.)

Dear Judge Schofield:

My firm, along with our co-counsel, Laukaitis Law LLC, represent the plaintiff and the proposed class in the above-referenced action.

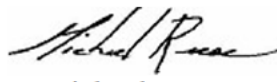
In response to the Court's Order of February 3, 2025 (ECF No. 53), we submit this letter to re-new the motion to file under seal (ECF No. 51) the letter previously filed by Defendant on January 29, 2025 (ECF No. 52).

A partially redacted version of ECF No. 52 is being filed simultaneously as an exhibit to this letter motion. We request the unredacted parts of ECF No. 52 remain under seal because they provide sensitive, confidential information that could be harmful to the plaintiff if made public. see ECF No. 37.

We note that this Court has already ruled that the "Application [is] GRANTED in part as to Plaintiff's identity information and otherwise DENIED without prejudice to renew." See ECF No. 53. Accordingly, pursuant to the Court's prior ruling, the Plaintiff's identity information is redacted.

The additional section redacted provides the reason that the identity information is redacted. This explanatory section should also be redacted as it explains the reasons why the plaintiff is particularly vulnerable regarding disclosure of his identity. Indeed, in litigation alleging data-breach or other misappropriation of personally identifiable information ("PII"), as is the case here against Defendant Barclays, it is common for plaintiffs to proceed under a pseudonym to protect them from further harm due to the misappropriation of their PII.

Respectfully submitted,



Michael R. Reese

**Appendix Pursuant to Individual Civil Rule I.D.3**

Defendant and all counsel representing Defendant in this matter who are subject to the Confidentiality Order (ECF No. 37) should have access to the letter filed under seal.